

1 As a result of Respondent's unprofessional conduct, the Colorado Medical Board ordered
2 Respondent be sanctioned by public letter of admonition and prohibited from signing medical
3 marijuana certificates for two years.

4 4. On or about October 20, 2015, Respondent self-reported the Colorado disciplinary action
5 to the Board, followed by a letter of self report, which was received by the Board on
6 October 24, 2014.

7 5. As a result of the disciplinary action taken by the Colorado Medical Board, the Medical
8 Board of California issued an Accusation against Respondent on December 24, 2014. The
9 Medical Board of California and Respondent entered into a Stipulated Settlement and Disciplinary
10 Order, which was issued by the California Board on April 2, 2015.

11 6. As a result of the disciplinary action taken by the Colorado Medical Board, the
12 Washington Medical Quality Assurance Commission (Commission) filed a Statement of
13 Allegations and Summary of Evidence against Respondent on February 11, 2015. The
14 Commission and Respondent entered into a Stipulation to Informal Disposition on
15 February 11, 2015. The Stipulation is not formal disciplinary action. However, Respondent
16 agreed that Respondent would notify the Commission if she practices as a physician and surgeon
17 in Washington. The Stipulation was to be reported through third party data centers.

18 7. On or about May 5, 2015, Respondent self-reported the California Stipulated Settlement
19 and Disciplinary Order, and the Washington Stipulation to the Board.

20 **COUNTS I & II**

21 **(Disciplinary Action Taken by Another State – Two Counts)**

22 8. All of the allegations in the above paragraphs are hereby incorporated as if fully set forth
23 herein.

24 9. Any disciplinary action, including revocation, suspension, modification, or limitation of a
25 license, taken by another state is grounds for the Board to initiate disciplinary action against a
26 licensee in Nevada. NRS 630.301(3).

27 10. The Colorado Medical Board's Final Order constitutes disciplinary action taken by another
28 state.

1 11. The Medical Board of California's Stipulated Settlement and Disciplinary Order
2 constitutes disciplinary action taken by another state.

3 12. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in
4 NRS 630.352.

5 **WHEREFORE**, the IC prays that the Board:

6 13. Give Respondent notice of the charges set forth in this Complaint;

7 14. Give Respondent notice that she may file an answer to the Complaint as set forth in
8 NRS 630.339(2) within twenty (20) days of service of the Complaint;

9 15. Set a time and place for a formal hearing after holding an Early Case Conference pursuant
10 to NRS 630.339(3);

11 16. Determine the sanctions it will impose if it finds Respondent violated the Medical Practice
12 Act;

13 17. Make, issue, and serve on Respondent, in writing, its findings of fact, conclusions of law
14 and order, which shall include the sanctions, if imposed; and

15 18. Take such other and further action as may be just and proper in this matter.

16 DATED this 26th day of May, 2015.

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18 INVESTIGATIVE COMMITTEE OF THE
19 NEVADA STATE BOARD OF MEDICAL EXAMINERS

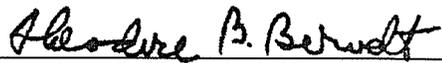
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21 By: 
22 Alexa M. Emmermann, Esq.
23 General Counsel
24 Attorney for the Investigative Committee
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VERIFICATION

1 STATE OF NEVADA)
2 : ss.
3 COUNTY OF WASHOE)

4 Theodore B. Berndt, M.D., hereby deposes and states under penalty of perjury under the
5 laws of the state of Nevada that he is the Chairman of the Investigative Committee of the Nevada
6 State Board of Medical Examiners that authorized the foregoing Complaint against the
7 Respondent herein; that he has read the foregoing Complaint; and based upon information
8 discovered during the course of the investigation into a complaint against Respondent, he believes
9 the allegations and charges in the foregoing Complaint against Respondent are true, accurate and
10 correct.

11 Dated this 26th day of May, 2015.

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14 Theodore B. Berndt, M.D.
15 Chairman, Investigative Committee
16 Nevada State Board of Medical Examiners
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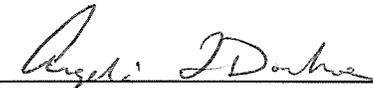
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CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 27th day of May 2015; I served a file stamp copy of COMPLAINT & FINGERPRINT INFORMATION via USPS e-certified return receipt mail to the following:

Rita Starritt, M.D.
5721 La Jolla Hermosa Ave.
La Jolla, CA 92037-7330

Dated this 27th day of May, 2015.



Angelia L. Donohoe
Legal Assistant